

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Case No. 17-CR-20662

v.

HON. DAVID M. LAWSON

D-1 CELIA WASHINGTON,

Defendant.

**STIPULATION FOR CONTINUANCE OF SCHEDULING ORDER  
DATES AND FINDING OF EXCLUDABLE DELAY**

The United States of America and defendant Celia Washington, by and through their counsel of record, present this stipulation for the entry of an Order continuing the deadlines established in the Court's October 25, 2017 Criminal Trial Notice and Scheduling Order (Doc. 9) for 120 days, to dates and times to be determined by the Court, and finding of excludable delay. In support of this stipulation, the parties state as follows:

1. The October 25, 2017 Scheduling Order provides that the motion filing deadline, signed Rule 11 Plea Agreement, and Final Pretrial Conference/Entry of Plea are due by, or are scheduled for November 30, 2017, and trial shall commence on December 19, 2017.

2. The 120 day continuance is necessary in order to allow defense counsel time to obtain and review discovery, conduct investigation and research, and write

and file anticipated motions. The parties are in agreement that this case is of significant factual and legal complexity. It involves a Title III wiretap, with a significant number of intercepted telephone calls. Because of this fact, the discovery materials are extensive. Taking into account the complex legal and factual circumstances of the case and the parties' exercise of due diligence, the parties will require the additional time to produce and review discovery materials, further investigate the case, and to prepare for trial. Accordingly, the denial of this request for an extension of the trial date would likely result in a miscarriage of justice.

3. The continuance will be excludable time under the Speedy Trial Act pursuant to 18 U.S.C. §§ 3161(h)(1) and (7)(A), when considering the factors under Section 3161(h)(7)(B)(i)-(iv) and that the ends of justice will be served by the

granting of such continuance and outweighs the best interests of the Defendant and the public in a speedy trial.

**IT IS SO STIPULATED:**

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Dated: November 1, 2017